Illinois Environmental Protection Agency (IEPA) Language Access Plan

Background

Illinois is home to a large and diverse population with about one-and-three-quarter million foreign-born residents. Individuals that do not use English as their primary language and have a limited ability to read, write, speak, or understand English are considered limited English proficient (LEP). Almost three million residents speak a language other than English at home and more than a million speak English less than "very well," classifying them as LEP.¹.

This document seeks to provide employees at the Illinois Environmental Protection Agency (IEPA or the Agency) with resources and a protocol for interacting with identified LEP individuals. In addition, this document reflects the Agency's policy that when individuals need language assistance to meaningfully participate in IEPA's programs or events, opportunities for such assistance will be identified and pursued when circumstances meet the guidelines of this Plan.

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Legal Authority

The Agency is a recipient of federal financial assistance. As a contractual recipient of federal funding, IEPA is obliged to comply with applicable provisions of federal civil rights laws and policies prohibiting discrimination, including Title VI of the Civil Rights Act of 1964 (Title VI). 42 U.S.C. § 2000d. Title VI specifically prohibits recipients from discriminating on the basis of race, color, or national origin. The U.S. Supreme Court held in *Lau v. Nichols*, 414 U.S. 563 (1974), that actions by a federally funded program that have a disproportionate negative effect on LEP persons, including denying the LEP individuals a meaningful opportunity to participate in the

¹ US Census Bureau, American Community Survey 2015 - 2019 Five Year Estimate

relevant program, are barred by the Title VI prohibition against national origin discrimination. Thus, recipients of federal financial assistance have an obligation to reduce language barriers that can preclude meaningful access by LEP persons to government services.

Additionally, Executive Order 13166 (August 11, 2000), *Improving Access to Services for Persons with Limited English Proficiency*, requires each federal agency that provides financial assistance to recipients to develop guidance regarding their obligations under Title VI to provide meaningful access to LEP persons. The U.S. Department of Justice (DOJ) simultaneously issued general guidance (DOJ Guidance) to federal agencies on implementation of the Executive Order 65 FR 50123 (August 16, 2000). Subsequently, U.S. EPA issued its own guidance (U.S. EPA Guidance) to federal funding recipients on the Title VI prohibition against national origin discrimination affecting LEP persons. (69 FR 35602, June 25, 2004).

Similarly, the Illinois Civil Rights Act of 2003, which is modeled after Title VI, prohibits units of State, county, and local government from utilizing criteria or methods of administration that have a disparate impact on the basis of race or national origin, regardless of intent. *See* 740 ILCS 23/5.

IEPA Program Assessment

In developing this Language Access Plan (LAP), IEPA has generally followed the recommendations provided in the <u>U.S. EPA Guidance</u> (U.S. EPA). The U.S. EPA Guidance addresses and incorporates the principal elements in the <u>U.S. DOJ Guidance</u> (DOJ). The Plan focuses on activities that are targeted to the general population or to specific individuals rather than regulatory communications that are focused on industry or municipalities, such as communications with regulated entities. Affected activities include permitting activities, remedial/cleanup activities, educational activities, development of rules, and responding to inquiries from Illinois residents. The U.S. EPA Guidance makes clear that recipients like IEPA "have considerable flexibility in determining how to comply with their Title VI legal obligation in the LEP setting." (69 FR 35613). Agencies are encouraged to determine the extent of their LEP obligations by performing an individualized assessment in accordance with a four-factor analysis described in the U.S. EPA Guidance. The ultimate purpose of the assessment is to achieve an appropriate balance of the four factors.

As set forth below, IEPA has performed an assessment of the four factors presented in the U.S. EPA Guidance.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered

The U.S. EPA Guidance indicates that determining reasonable steps for providing meaningful access depends on the number or proportion of people who would be excluded due to

language barriers. The greater the number or proportion of LEP persons in an area, the more likely language services are needed. IEPA's service area extends to the whole of the state of Illinois, where approximately 23% of the population speaks a language other than English at home and approximately 8.6% of the population and 4.5% of households are Limited English Proficient (American Community Survey, 2015-2019). IEPA can thus anticipate that some portion of the population or households of LEP persons may be encountered by IEPA programs.

Information related to site-specific LEP needs may be available from the following sources: IEPA employees with experience in the community, local government, school, religious and community organizations, legal aid entities, census data, U.S. EPA and IEPA GIS tools. These sources may assist in identifying populations for whom additional language services are needed and for which populations translation services would be most beneficial.

In Illinois, the largest LEP population is Spanish speaking, making up approximately 5% of the state population and approximately 59% of the entire LEP population in Illinois (American Community Survey 2015-2019). The next largest language groups are Polish-speaking (approximately 7.4% of the LEP population), Chinese-speaking (including Mandarin and Cantonese) (approximately 5% of the LEP population), Arabic-speaking (approximately 2.3% of the LEP population), Tagalog-speaking (approximately 2.2% of the LEP population), Korean-speaking (approximately 2.1% of the LEP population), and Russian-speaking (approximately 1.9% of the LEP population).

It should be noted that, while in most cases few in number, certain populations have a higher percentage of their total population as LEP speakers. The Chinese, Korean, Khmer and Vietnamese-speaking populations in Illinois are greater than 50% LEP, thereby increasing the chance that few members or possibly no one in a household will be English proficient.

Factor 2: The frequency of contact with LEP individuals

According to the U.S. EPA Guidance, the LEP obligations of a recipient such as IEPA are greater if there is more frequent contact with LEP individuals when compared to unpredictable or infrequent contact. The U.S. EPA Guidance further indicates that the frequency of LEP contact and the resulting need for agency assistance can be assessed on a language-specific basis. In other words, the more frequent contact that a federal funding recipient has with a particular language group, the more likely that enhanced language services in that language are needed.

The frequency of contact with LEP individuals likely vary significantly across IEPA programs and the specific locations where they conduct activities. Due to the nature of most of the Agency's programs and regulatory requirements, contact with any particular LEP community is infrequent and unpredictable. The main exception to this is with the Vehicle Inspection and Maintenance program, which for those residents living in areas of the state in which the program is in effect will tend to involve more direct involvement with the public.

Factor 3: The nature and importance of the program

The U.S. EPA Guidance indicates that the need for language services is related to the importance of the action by a recipient. For example, U.S. EPA states that the obligation to communicate information to a person who may be adversely impacted by an immediate water source contamination or to a sudden release of airborne toxic chemicals differs from those related to providing information on efforts to increase recycling. With this guidance in mind, the need for LEP services could vary significantly, as actions by IEPA programs cover a broad spectrum in terms of urgency and potential consequences. The Agency will prioritize its LEP assistance for 1) those critical and health protective services, e.g. assuring that boil orders are issued in appropriate language(s) or in situations where there is the imminent threat of contaminant exposure above a regulatory level, and 2) information produced from and targeted to the general population, such as certain factsheets and brochures providing information to the general public, and 3) those programs that are of a licensing nature for the general public or are required for the public to obtain licensing, such as the Vehicle Inspection and Maintenance program.

Factor 4: The resources available

The U.S. EPA Guidance discusses the potential impact of available agency resources in determining what would constitute reasonable steps to address LEP concerns. In summary, the guidance states that agencies with larger budgets would be expected to provide more language services than those with smaller budgets. In addition, the U.S. EPA Guidance states that "reasonable steps" may cease to be reasonable where the costs substantially exceed the benefits. IEPA will establish a two-step process providing 1) translation of appropriate documents and as needed 2) interpretation in appropriate settings. IEPA will use a mix of techniques, including in-house staff, technology-based (e.g., translation software), and outside contractors to efficiently provide LEP services consistent with the guidelines of this plan.

LAP Implementation

Based on the four-factor assessment above, IEPA has developed a plan for implementation to achieve its LEP goals. IEPA acknowledges the benefit of having a Plan to provide meaningful access to LEP individuals, as it will dovetail with the interests advanced by the IEPA's Environmental Justice (EJ) Policy to assure that agency decision-making takes into consideration environmental equity in the administration of its programs. Such planning and implementation should also assure that federal funding currently provided by U.S. EPA will not be potentially compromised by failing to consider the consequences of LEP individuals affected by administration of agency programs.

The nature of the Plan will be implemented on a case-by-case basis but will be aided by select criteria that are meant to provide a more objective-based approach, mirroring related developments by other States. The IEPA's LAP will continue to develop, as appropriate, through the normal course of the IEPA's regulatory and programmatic duties. This approach is consistent with the requirements of Title VI. The U.S. EPA Guidance states: "While all recipients should work toward building systems that will ensure access for LEP individuals, U.S. EPA acknowledges that the implementation of a comprehensive system to serve LEP individuals is a process and that a system will evolve over time as it is implemented and periodically reevaluated." 69 FR 35612.

Identifying LEP Individuals Who Need Language Assistance

The analysis under the first and second factors above provides a starting point for determining those LEP individuals who may be eligible for language assistance with respect to agency programs. Because IEPA's actions and public outreach are often community-based, the identification of LEP individuals will depend upon the population in the specific community. Building on its experience with numerous communities across the state, IEPA will continue collaborating with community leaders and members to enhance its awareness of the LEP individuals within the potentially impacted communities. Achieving this often involves coordination between IEPA program staff, the IEPA Office of Community Relations (OCR), and the IEPA Office of Environmental Justice (OEJ). Additional resources utilized by IEPA staff to identify if a community has potential LEP populations or individuals who need language assistance include: IEPA's EJ Start mapping tool, Census and American Community Survey data, U.S. EPA's EJScreen tool, and historic and current interactions with community members and community organizations.

Vital Documents

Definition of Vital Documents

The DOJ guidance indicates that a document is "vital" if it "contains information that is critical for obtaining [federal] services and/or benefits or is required by law... Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner."

The IEPA will continue to review, identify, and translate vital documents in accordance with the LAP to ensure it is taking reasonable steps to provide meaningful access to its programs and activities. Documents identified below may be published on the IEPA's webpage or, in the case of public notices, also distributed in accordance with applicable laws and regulations.

Documents which currently have been identified for translation include:

- Public Notices (for sources located in communities meeting the LAP criteria for translation)
- Pollution Complaint Form
- Language Access Complaint Form
- Environmental Justice Policy
- Environmental Justice Public Participation Policy
- FOIA Request Web Form
- Fugitive Dust Complaint Log
- Odor Log Sheets
- Right-to-Know notices (for sources located in communities meeting the LAP criteria for translation)
- Environmental Justice Grievance Procedure
- Vehicle Emissions Testing Program
- IEPA Open Burning Permits Fact Sheet
- Drinking Water Watch
- Drinking Water Information
- Lead Informational Notice
- Emergency Release Notification Fact Sheet
- Clean Energy Job Act Rebate Information
- Low Income Residential Energy Efficiency Program

LEP Assessment

Specifically, for site-specific actions such as public notices and other notifications related to permitting and clean-up programs, the IEPA will:

- 1. Use the above screening tools to assess the LEP population within a 1-mile radius of the site in question; unless the Agency has reason to believe based on quantifiable evidence that the assessed area should be larger or smaller.
- 2. Assess language assistance requests and use previous interactions in the community for the site or other nearby sites.
- 3. After screening and assessment of previous requests and use, if the total LEP population is significant (defined here as equal or greater than 20%), the IEPA will use Census American Community Survey data and other available tools to determine the probable language(s) spoken by the community in the area of assessment.

Language Assistance Measures

The U.S. EPA Guidance states that the two principal methods of serving LEP individuals are providing oral and written language services. Oral language services consist of interpretation by

listening to something in one language and orally translating it into another language. This may include providing on-site interpreters when a high volume of LEP individuals will attend a significant public event. Written language services consist of language translation by replacing written text from one language into equivalent written text in another language. It may range from translation of an entire document to translation of a short or descriptive summary of the document.

It should be noted that, for both oral & written, but particularly for written translations, not all idiom, metaphorical, or other linguistic devices inherent in a language may be directly translatable and thus, a translation will never be a perfect or direct representation and that nuance must be used to interpret the ideas that are being communicated. This is a consideration in the decision not to translate legally enforceable documents.

Program Assessment

<u>Programs under Factors 2 and 3: A large number of individuals effected and the nature of the program</u>

- 1. Vehicle Inspection and Maintenance (VIM): Motorists with specified vehicles in the Chicago and Metropolitan St. Louis non-attainment areas are required to bring their vehicles into a vehicle emissions testing station for an emissions test every two years. These vehicles must pass an emissions test in order for the motorist to renew the vehicle registration or license plate sticker. These motorists have contact with the IEPA's contractor that operates the vehicle emissions testing stations.
 - Consequently, this VIM program meets both the criteria of frequency of contact and importance of the program. In consideration of the resources available and the significant percentage (<50% of LEP Speakers in the State) of Spanish-language individuals in the state, the VIM program includes a Spanish-language hotline and Spanish speaking representatives to respond to motorist inquiries.
- 2. The U.S. EPA guidance also describes a flexible translation standard and acknowledges that distinctions can and should be made between frequently encountered and less commonly encountered languages when identifying languages for translation. To this end, the Spanish-language community is by far the largest LEP community in Illinois. For general inquires and issues that are not facility or site-specific, the Agency will establish a contact point for Spanish-speaking LEP individuals.
- 3. For future documents of a general nature and directed to a statewide audience, e.g., statewide factsheets with environmental information such as "open burning" factsheets, the Agency will provide Spanish translations of the documents. The IEPA will work to translate existing documents of this sort over time into Spanish translations. For

other languages, the IEPA will consider requests for translations of the documents on a case-by-case basis.

Programs under Factors 2 and 3 with infrequent contact

1. Other programmatic areas of the Agency have unpredictable or infrequent contact with any particular community, neighborhood, or municipality. If when working in a community, the assessment of LEP individuals described above identifies a significant percentage (20%) of LEP individuals in the assessed area, the IEPA will provide translation assistance for non-legal documents targeted to the public, e.g., public notices, factsheets, and interpretation assistance as needed.

Legally binding documents, e.g., permits, court orders, rules, and regulations will not be translated as this could create confusion concerning legal requirements.

Training of IEPA Staff

Training will be provided to IEPA staff, with particular focus on employees who are likely to encounter LEP individuals. The training will include information about the LAP and the related resources, policies, and procedures. Staff who routinely encounter LEP persons will be offered refresher training and the opportunity to provide feedback on the Agency's LAP.

All IEPA staff must be aware of and understand how to assist LEP individuals requesting language services to ensure meaningful access to all Agency programs, services, and activities. Relevant staff will receive annual training on policies, processes, and resources available for language services, particularly as language access methods evolve. IEPA will incorporate language access training into the OneNet suite of training modules so that staff may easily access the training online.

Training will focus on:

- The importance of offering language assistance services
- How to effectively and respectfully communicate and interact with LEP individuals
- IEPA's policies, procedures, and protocols related to providing language assistance services, including the availability of interpretation and translation services at no cost to the requestor;
- What type of translated information is available to LEP individuals and where it can be found; and
- How staff can assist in tracking data around requests for language assistance services.

Managers: All managers and senior level personnel at the Agency shall be trained so that they understand the content of the LAP and the decision-making process for interacting with LEP individuals. This training will be completed by October 2023 and will be required annually.

OCR and OEJ: The responsibility to implement the LAP resides with OCR and OEJ staff working with Bureau management. OCR and OEJ staff will be trained on how to effectuate the procedures to identify potential LEP populations, obtain and implement LEP services. This training will be completed by October 2023 and will be required annually.

Staff: Are to know that the Agency has an LAP and to assist in LEP efforts as directed by their management. This training will be completed by October 2023 and will be required annually.

Providing Notice to LEP Persons

IEPA seeks to be proactive and inform LEP individuals that language services are available. IEPA will utilize the following methods as appropriate in each situation.

- Signs
- Documents
- Working with community-based organizations and other stakeholders to inform LEP individuals of services that may be offered by IEPA, including the availability of language assistance services.
- Using a telephone voice mail menu. The menu could be in the most common languages encountered. It should provide information about available language assistance services and how to get them.
- Notices

Monitoring and Updating the LAP

IEPA intends to periodically review this LAP to determine if language assistance measures and staff training are effective. In evaluating the effectiveness of the Plan and the need for additional measures, IEPA will assess the feedback from agency staff and the public, including LEP individuals.

Language Assistance Services & Protocols

1. Survey of the IEPA Staff Language Capabilities

The IEPA OEJ identified three employees compensated for bilingual skills. These employees are fluent in Spanish and are compensated for performing translation tasks. Additionally, IEPA have staff that are fluent in a number of different languages but are not currently compensated for their bilingual skills. However, staff are eligible for bilingual "temporary assignment" pay for the time spent performing bilingual duties.

2. Multilingual Media Contact List

The State of Illinois currently maintains a statewide media contact database. This list consists of more than 400 media outlets that provide coverage of Illinois events, which includes 161 media outlets that are based in Illinois. This database can be sorted by print and electronic media. Additionally, the State of Illinois maintains a multilingual media contact list featuring more than 50 stations in Illinois. All media outlets have the ability to help disseminate news releases, media advisories, or emergency bulletins to its viewing/listening area.

3. Advisory Notices

The IEPA OEJ will post notices of non-discrimination in various languages on its website and announce the availability of interpretation services.

The telephone numbers to call to file a complaint if an individual believes he or she has been discriminated against shall also be posted. The number to contact the IEPA Title VI Coordinator, Chris Pressnall, is 217-524-1284.

4. Language Assistance Services and Protocols

IEPA's language assistance services and protocols include:

- Bilingual staff
- Oral interpretation services
 - Interpreters/Bilingual Staff
 - American Sign Language interpretation
 - Teletype Device (TTY)/Telecommunication Device for Deaf (TDD)
- Written language translation of Vital Documents

Bilingual Staff and Training

IEPA OCR and OEJ have employees who are fluent in Spanish. Spanish-speaking employees are compensated for translation services that they provide. Additionally, IEPA staff that are not currently compensated for their bilingual skills, as required by their job duties, are eligible for bilingual "temporary assignment" pay for the time spent performing bilingual duties.

IEPA bilingual staff have access to a "Spanish Terms Cheat Sheet" (the file is saved in the internal Agency share-drive). This resource includes examples of common Agency phrases that can be helpful to bilingual staff when encountering Spanish-speaking LEP individuals. Bilingual staff should refer to this resource, but also use their discretion when communicating with Spanish-speaking LEP individuals. Additionally, documents including factsheets and public notices are available and published on the IEPA website in English, and where there is a significant Spanish-

speaking LEP population, or need, the documents are available in Spanish as well. OCR and OEJ bilingual staff can refer to these documents, as needed, and use them as examples when translating documents to Spanish. Staff likely to encounter LEP individuals such as OCR and OEJ staff will be trained on the specific procedures of the LAP. Staff at the IEPA not likely to encounter LEP individuals will nevertheless be made aware of the LAP and the procedures for accessing translation services should the need arise.

<u>Interpretation</u>

Interpretation is the rendering of one spoken or signed language into that of another language. Interpretation services include telephonic and face-to-face interpretation as well as sign-language interpretation. A state contract for procuring interpretation services exists for all state agencies, including IEPA.

Per state contract, *Propio Language Services* provides three-way phone interpretation. Per the state contract, *Multilingual Connections* provides interpretation services at public meetings/hearings, legal meetings/hearings, and other legal proceedings, conferences, workshops, training sessions, and other direct person-to-person interactions. Requests for interpretation services from Multilingual Connections can be made by the IEPA OCR or the OEJ.

<u>Telephonic Interpretation</u>

Telephonic Interpreter Services (TIS) are available for all in-person and telephone contact with the public. If a member of the public calls the IEPA and does not speak English or Spanish, Propio Language Services should be contacted for interpretation services by taking the following steps.

Using Telephone Interpretation Line

- 1. Dial: 1-217-834-8424
- 2. When prompted
 - For a Spanish interpreter Press 1
 - For all other languages

Press 2

Enter the 2-digit language code (see Language Interpretation Directions, 01 for Spanish)

- 3. Enter the 5-digit account#17190
- 4. Provide to agent:

Caller's first name and last name; office name/location; and Bureau name and title

For 3-way calls:

Ask the first person who answers (interpreter or call coordinator) to place the call.

Back-Up Interpreter Number: 1-866-386-1284

(Only use if interpreter is unavailable at primary number above)

*NOTE: If the Telephonic Interpreter Services are used through *Propio*, you must notify Fiscal immediately after using the service for invoicing and accounting purposes.

American Sign Language Interpretation

American Sign Language (ASL) interpretation services are provided by *Multilingual Connections LLC*. Requests for ASL interpretation services should be made at least 1-2 weeks in advance. Requests for ASL interpretation services from *Multilingual Connections* can be made by coordinating with the IEPA OCR or the OEJ.

Staff must not require an individual to provide their own sign language interpreter.

ASL Interpreter Feedback Mechanism

Questions, concerns, or feedback with regard to the telephonic interpreter session, including the quality of the telephonic interpretation, should be made directly to the IEPA Language Access Coordinator, Chris Pressnall (chris.pressnall@illinois.gov).

Complaints may also be made to:

Illinois Deaf and Hard of Hearing Commission (IDHHC)

Attn: Interpreter Complaint Department

528 South 5th Street, Suite 209

Springfield, IL 62701

Voice: 877-455-3323 or 217-557-4495*

Video Phone: 217-303-8010

TTY: 888-261-2698 Fax: 217-557-4492

https://idhhc.illinois.gov/community/interpretercomplaint.html

<u>Teletype Device (TTY)/Telecommunication Device for Deaf (TDD)</u>

A TTY and TDD are auxiliary aids and services for individuals with hearing impairments. A relay system makes it possible for individuals who are deaf to use TTYs to call other people who may not have a TTY. Illinois has the *Illinois Relay Center* (IRC), also known as "Dual Party Relay." IRC is a 24-hour-a-day, seven-day-a-week service which provides a communications link between those who use a TTY and those who use a standard voice telephone. Those using a TTY can reach the IEPA by dialing 888-273-5488.

Translation

^{*}For individuals calling the "voice" number, IDHHC calls are directed through the Federal Communications Commission's video relay system to accommodate Deaf staff.

Translation is the written or text-based rendering of one language into that of a secondary language. Certain IEPA documents can be translated into foreign languages by vendors that the State has contracted with. Translation at the IEPA is coordinated with OCR and OEJ.

In-House Translation Review and Feedback Mechanism

Employees reviewing translations and/or those requesting internal reviews should follow these guidelines to ensure quality.

The process can be divided into three broad steps.

1. Preparing materials.

- The English text is evaluated for readability, clarity, and cultural appropriateness.
- Ensure
 - correct reading level,
 - o language is simple and clear,
 - o messages and illustrations are culturally appropriate,
 - o translatability of the English document, and
 - o document is appropriately formatted for accessibility.
 - If materials will be distributed in hard copy (Word, PDF, etc.) they should be formatted so that they can be made available upon request in formats that are accessible to individuals who use assistive technology as required under the Americans with Disabilities Act and Section 504 of the Rehabilitation Act.
 - Document prints clearly in black and white if it will be posted on the internet for public download.
 - o If contact information is listed, program must have capacity to interface with people who are LEP. In most cases, having Telephonic Interpreter Services solves the issue. The availability of such services will be listed on the materials.
 - A translator is identified. Generally, translation services are to be provided by Multilingual Connections.

2. Translation.

- The initial translation is performed.
- Program staff should discuss the following with the translators:
 - o purpose of the material
 - o appropriate reading level of the target population
 - o key health messages, and
 - o terminology specific to the message
- The translator needs to be encouraged to ask questions, because the quality of the translation is dependent upon the translator's understanding of the English document.

- A conceptual translation should be used, as opposed to a word-for-word, sentence-by-sentence translation. This method allows the translator to select from a variety of ways to express the message to the target audience. The use of a non-literal methodology conveys the intended message in a more culturally relevant way than the use of literal or a word-for-word translation.
- Use two translators one for the initial translation and the second to review and edit the translation, checking for accuracy, tone, and appropriateness. The translation is given to a second translator who will check style, grammar, accuracy, and comprehension of the messages. The second translator will also review the literacy level of the translation.
- If *Multilingual Connections* is to be contracted for translation services, ensure that editing by a second translator is provided and that this cost is included in the price estimate.

3. Revision/Editing.

- "Back-to-English" translation is not recommended as an effective method to ensure effectiveness.
- Translated materials, too, should be field-tested. A simple way of doing this is by working with community providers, community members, and/or bilingual staff. They can review your documents and provide valuable input.

Federal LEP Guidance Documents

Title VI Guidance for Recipients:

https://www.lep.gov/

Environmental Protection Agency (U.S. EPA):

https://www.federalregister.gov/documents/2004/06/25/04-14464/guidance-to-environmental-protection-agency-financial-assistance-recipients-regarding-title-vi

Department of Justice (DOJ):

https://www.federalregister.gov/documents/2002/06/18/02-15207/guidance-to-federal-financial-assistance-recipients-regarding-title-vi-prohibition-against-national

Department of Energy (DOE):

https://www.federalregister.gov/documents/2004/08/16/04-18636/nondiscrimination-infederally-assisted-programs-enforcement-of-title-vi-of-the-civil-rights-act-of